

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE**

In re: Terrorist Attacks on September 11, 2001 (S.D.

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 23, 2022

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

On behalf of the Plaintiffs' Executive Committees, and with the consent of the Kingdom of Saudi Arabia and Dallah Avco, we write to respectfully request that the Court afford the plaintiffs until Tuesday, June 28, 2022, to respond to the Kingdom of Saudi Arabia's letter filed at ECF No. 8131, proposing schedules for, *inter alia*, a renewed motion to dismiss and the parties' *Daubert* motions. The additional time is necessitated due to the ongoing deposition schedule of five expert witnesses (including on June 22, 23, 27 and 29), in which a number of the plaintiffs' counsel are engaged, as well as a number of other professional and personal commitments.

Counsel for Saudi Arabia and Dallah Avco have indicated that the proposed schedule is acceptable and have asked that the Court set Friday, July 1, 2022, as the deadline for reply briefing, to which plaintiffs are agreeable.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter

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The Honorable Sarah Netburn, U.S.M.J.

June 23, 2022

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By: /s/ Andrew J. Maloney, III

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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF

The Plaintiffs' request is GRANTED. They shall file their response to the Kingdom of Saudi Arabia's proposal at ECF No. 8131 by June 28, 2022. Any reply shall be filed by July 1, 2022.

**SO ORDERED.**

Dated: June 24, 2022

New York, New York

  
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SARAH NETBURN  
United States Magistrate Judge